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 Club TVPad, Inc. and
 Bennett Wong

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a
 China company; CHINA
 INTERNATIONAL
 COMMUNICATIONS CO., LTD., a
 China company; TVB HOLDINGS
 (USA), Inc., a California corporation;
 and DISH NETWORK L.L.C., a
 Colorado corporation,

Plaintiffs,

v.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company;
 HUA YANG INTERNATIONAL
 TECHNOLOGY LIMITED, a Hong
 Kong company; SHENZHEN
 GREATVISION NETWORK
 TECHNOLOGY CO., LTD., China
 company; CLUB TVPAD, Inc., a
 California corporation; BENNETT
 WONG, an individual; ASHA MEDIA
 GROUP, INC. d/b/a TVPAD.COM, a
 Florida corporation; AMIT BHALLA,
 an individual; NEWTVPAD LTD.
 COMPANY d/b/a NEWTVAD.COM
 a/k/a TVPAD USA, a Texas
 corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a
 E-DIGITAL, an individual; JOHN
 DOE 1 d/b/a/BETV; JOHN DOE 2
 d/b/a YUE HAI; JOHN DOE 3 d/b/a
 516; JOHN DOE 4 d/b/a HITV; JOHN
 DOE 5 d/b/a GANG YUE; JOHN DOE
 6 d/b/a SPORT ONLINE; JOHN DOE

Case No. CV 15-1869 MMM (AJWx)

**DECLARATION OF BENNETT
 WONG**

Courtroom 780
 The Honorable Margaret M. Morrow

Complaint Filed: March 13, 2015

RYU LAW FIRM
 5900 Wilshire Boulevard, Suite 2250
 Los Angeles, CA 90036
 (323) 931-5270

1 7 d/b/a GANG TAI WU XIA; and
2 JOHN DOES 8-10,
3 Defendants.

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6 DECLARATION OF BENNETT WONG

7 1. I, Bennett Wong, am the sole shareholder and president of defendant Club TvPad,
8 Inc. I make this declaration in my individual capacity as a named defendant, as well as on behalf
9 of defendant Club TvPad, Inc. (hereafter "DECLARANT"). I make this declaration for the
10 purpose of complying with this Court's Order issuing a preliminary injunction. I make this
11 declaration based upon my personal knowledge and, if called upon, will testify thereto.

12 2. DECLARANT was previously engaged in the business of selling a device known
13 as a "TvPad" via the world wide web.

14 3. DECLARANT has not sold any TvPad device since before the initiation of the
15 instant litigation, and has no plans to sell any TvPad device in the future.

16 4. DECLARANT has disabled its website through which it had previously sold the
17 TvPad device, and has further disabled its internet forum.

18 5. DECLARANT has provided plaintiffs' counsel with the internet protocol address
19 that had been used by DECLARANT to sell the TvPad device.

20 6. Since the issuance of the injunction. DECLARANT has not been in
21 communication with any of the other defendants.

22 I declare under penalty of perjury that the foregoing is true and correct, and that the
23 declaration is executed on July 1, 2015 in Hayward California.

24
25 

26 _____
27 Bennett Wong